

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**RUTHANN BAUSCH, MARCIA DAY
DONDIEGO, JUDITH REED, RHODA
EMEFA AMEDEKU, DANIEL STROHLER,
SHARON STROHLER, BERNARD BOAKYE
BOATENG, LORI RIEKER, and LISA
DANNER,**

Plaintiffs,

v.

**LEHIGH COUNTY BOARD OF ELECTIONS,
NORTHAMPTON COUNTY BOARD OF
ELECTIONS, and LEIGH M. CHAPMAN, in
her capacity as Secretary of the Commonwealth
of Pennsylvania,**

Defendants.

No. 22-cv-02111-JMG

**INTERVENOR-PLAINTIFF NICK MILLER’S PROPOSED JOINDER IN PLAINTIFFS’
COMPLAINT FOR DECLARATORY AND EMERGENCY INJUNCTIVE RELIEF**

Intervenor-Plaintiff Nick Miller, by and through his undersigned counsel, hereby joins Plaintiffs’ Complaint for Declaratory and Emergency Injunctive Relief as follows:

I. INTRODUCTION

1. Admitted upon information and belief. Answering further, Intervenor-Plaintiff Miller states that, upon information and belief, the 260 votes identified by Plaintiffs in their Complaint have not been counted in the unofficial results by the Lehigh County and Northampton County Boards of Elections. Intervenor-Plaintiff Miller is without knowledge or information sufficient to form a belief as to whether there are additional other ballots that fall into the categories identified by Plaintiffs. Intervenor-Plaintiff Miller reserves the right to assert that all ballots that fall into the categories identified by Plaintiffs should be counted.

2. Admitted upon information and belief. Answering further, Intervenor-Plaintiff Miller states that, upon information and belief, Plaintiffs Ruthann Bausch, Marcia Day Dondiego, Judith Reed, and Rhoda Emefa Amedeku are among voters whose mail-in ballots will not count because they were not placed in a “secrecy envelope” before being returned to the Lehigh County and Northampton County Boards of Elections. Intervenor-Plaintiff Miller is without knowledge or information sufficient to form a belief as to whether there are additional more Democratic voters than the 94 in Lehigh County and 23 in Northampton County whose mail-in ballots will not count because they were not placed in a “secrecy envelope” before being returned to the Lehigh County and Northampton County Boards of Elections. Intervenor-Plaintiff Miller reserves the right to assert that all ballots that fall into the categories identified by Plaintiffs should be counted.

3. Admitted upon information and belief. Answering further, Intervenor-Plaintiff Miller states that, upon information and belief, Plaintiffs Daniel Strohler, Sharon Strohler, Bernard Boakye Boateng, Lori Reiker, and Lisa Danner are among voters whose mail-in ballots will not count because they were returned after the date of the primary election but before the deadline for military and overseas ballots. Intervenor-Plaintiff Miller is without knowledge or information sufficient to form a belief as to whether there are additional more Democratic voters than the 118 in Lehigh County and 25 in Northampton County whose mail-in ballots will not count because they were returned after the date of the primary election but before the deadline for military and overseas ballots. Intervenor-Plaintiff Miller reserves the right to assert that all ballots that fall into the categories identified by Plaintiffs should be counted.

4–5. Admitted.

II. JURISDICTION AND VENUE

6–9. Admitted.

III. PARTIES

10–13. Admitted upon information and belief.

14–16. Admitted.

IV. FACTS

17. Admitted upon information and belief. Intervenor-Plaintiff Miller is without knowledge or information sufficient to form a belief as to whether there are more than 117 Democratic in the Fourteenth Senatorial District whose mail-in ballots will not count because they were not placed in a “secrecy envelope” before being returned to the Lehigh County and Northampton County Boards of Elections. Intervenor-Plaintiff Miller reserves the right to assert that all ballots that fall into the categories identified by Plaintiffs should be counted.

18. Admitted upon information and belief. Intervenor-Plaintiff Miller is without knowledge or information sufficient to form a belief as to whether there are more than 143 Democratic voters in the Fourteenth Senatorial District whose mail-in ballots will not count because they were returned after the date of the primary election but before the deadline for military and overseas ballots. Intervenor-Plaintiff Miller reserves the right to assert that all ballots that fall into the categories identified by Plaintiffs should be counted.

19. Admitted upon information and belief.

20–38. Admitted.

V. CLAIMS

39–86. Admitted.

WHEREFORE, Intervenor-Plaintiff Nick Miller respectfully requests that this Court grant the relief requested in the Complaint for Declaratory and Emergency Injunctive Relief for

any and all ballots that fall into the categories at issue in the Complaint for Declaratory and Emergency Injunctive Relief.

Respectfully submitted,

/s/ Timothy J. Ford

Timothy J. Ford (Pa. Id. No. 325290)

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